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CAMILA RAMOS GARZON
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10 Attorneys for Plaintiffs
11 AMY SOON, AIKSHEE LOH, and BLU3
FOUNDATION, LLC d/b/a BLU3 DAO,
A Delaware Limited Liability Company

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

16 AMY SOON; AIKSHEE LOH; BLU3
17 FOUNDATION, LLC d/b/a BLU3 DAO, A
Delaware Limited Liability Company,

18 || Plaintiffs,

v.

20 CAMILA RAMOS GARZON; WOMEN BUILD WEB3

Defendants

Case No. 4:23-cv-05189-HSG

**JOINT STIPULATION TO CONTINUE THE
COURT'S SCHEDULED CASE
MANAGEMENT CONFERENCE AND
HEARING DATE ON DEFENDANTS'
MOTION TO DISMISS (PURSUANT TO
L.R. 6-2); ORDER**

Judge: Hon. Haywood S. Gilliam, Jr.
Date: June 12, 2025
Time: 2:00 p.m.
Crtrm.: 2

Action Filed: October 11, 2023

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs AMY SOON, AIKSHEE LOH, and
BLUE3 FOUNDATION, LLC d/b/a BLUE3 DAO (“Plaintiffs”) and Defendants CAMILA
RAMOS GARZON and WOMEN BUILD WEB3 (“Defendants”), (collectively, the “Parties”)
through their respective counsel of record, hereby jointly stipulate for an Order moving the
Court’s previously scheduled Case Management Conference on June 12, 2025, and the June 12,

1 2025 hearing on Defendants' Motion to Dismiss. [ECF No. 35].

2 WHEREAS, Plaintiffs filed the Complaint on October 11, 2023. [ECF No. 1].

3 WHEREAS, on February 27, 2025, Plaintiffs filed an affidavit of service showing that
4 service was effectuated on Defendants on February 27, 2025. [ECF No. 22]. Defendants'
5 deadline to respond to the Complaint was March 20, 2025.

6 WHEREAS, the Parties stipulated on March 14, 2025, to an extension of Plaintiffs'
7 responsive pleading deadline to April 10, 2025. [ECF No. 24].

8 WHEREAS, Defendants filed a motion to dismiss and motion to strike the Complaint on
9 April 10, 2025, and set a hearing date for May 15, 2025. [ECF No. 35].

10 WHEREAS, on April 15, 2025, the Parties stipulated to an extension of the briefing
11 deadlines set by the court related to Defendants' Motion to Dismiss. Relatedly, the Parties
12 stipulated to continuing the hearing date on Defendants' Motion to Dismiss from May 15, 2025 to
13 June 12, 2025. [ECF No. 42].

14 WHEREAS, the Initial Case Management Conference in this action is scheduled for June
15 12, 2025, to be held at the same time as the hearing on Defendants' Motion to Dismiss. [ECF No.
16 50].

17 WHEREAS, Plaintiffs have previously requested several extensions related to the deadline
18 to effectuate service on Defendants, which the Court granted. [See ECF Nos. 10, 11, 14, 15, 17,
19 19, 20, 21, 40, and 42].

20 WHEREAS, Mr. Salvina has a personal conflict June 12, 2025 through June 13, 2025, that
21 will prevent him from attending both the Initial Case Management Conference and the hearing on
22 Defendants' Motion to Dismiss. See Declaration of Benjamin D. Salvina ("Salvina Decl."), ¶ 11.

23 WHEREAS, counsel for the Parties conferred on and around May 22, 2025, and agreed to
24 stipulate to continue both the Initial Case Management Conference and the hearing on Defendants'
25 Motion to Dismiss from June 12, 2025, to July 17, 2025, to allow Plaintiffs' counsel with
26 decision-making authority to attend. See Salvina Decl., ¶ 12.

27 WHEREAS, good cause exists to continue the Initial Case Management Conference and
28 the hearing on Defendants' Motion to Dismiss. See Salvina Decl., ¶¶ 11-13.

1 THEREFORE, in accordance with Civil L.R. 6-2 and Civil L.R. 7-12, the undersigned
2 Parties stipulate as follows:

3 1. The Initial Case Management Conference is continued to July 17, 2025, at 2:00
4 p.m., in Courtroom 2; and

5 2. The hearing on Defendants' Motion to Dismiss is continued to July 17, 2025, at
6 2:00 p.m., in Courtroom 2, subject to the Court's availability.

7 IT IS SO STIPULATED.

8 DATED: May 23, 2025

KARPF, KARPF & CERUTTI, P.C.

10 By: /s/ Benjamin D. Salvina

11 Benjamin D. Salvina, Esq. (*pro hac vice*)
12 Attorneys for Plaintiffs
13 AMY SOON, AIKSHEE LOH, and BLU3
14 FOUNDATION, LLC d/b/a BLU3 DAO,
A Delaware Limited Liability Company

15 DATED: May 23, 2025

HOGE, FENTON, JONES & APPEL, INC.

17 By: /s/ Manda N. McElrath

18 Alison P. Buchanan
19 Manda N. McElrath
20 Attorneys for Plaintiffs
21 AMY SOON, AIKSHEE LOH, and BLU3
22 FOUNDATION, LLC d/b/a BLU3 DAO,
A Delaware Limited Liability Company

23 DATED: May 23, 2025

HOLLAND & KNIGHT LLP

24 By: /s/ Christine Walz

25 Christine Walz
26 David I. Holtzman
27 Attorneys for Defendants
CAMILA RAMOS GARZON
AND WOMEN BUILD WEB3

1 **CIVIL LOCAL RULE 5-1(H)(3) ATTESTATION**

2 Pursuant to Local Rules 5-1(i)(3), I, Amanda N. McElrath, hereby attest under penalty of
3 perjury that concurrence in the filing of this document has been obtained from all signatories.

4

5 DATED: May 23, 2025

HOGE, FENTON, JONES & APPEL, INC.

6

7 By: /s/ Manda N. McElrath

8 Manda N. McElrath
9 Attorneys for Plaintiffs
10 AMY SOON, AIKSHEE LOH, and BLU3
11 FOUNDATION, LLC d/b/a BLU3 DAO,
12 A Delaware Limited Liability Company

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ORDER

Pursuant to the stipulation of the parties:

1. The Initial Case Management Conference is continued to July 17, 2025, at 2:00 p.m., in Courtroom 2; and

5 2. The hearing date on Defendants' Motion to Dismiss/Strike is continued to July 17
6 2025, at 2:00 p.m., in Courtroom 2.

IT IS SO ORDERED.

DATE: 5/23/2025

Haywood S. Gilliam, Jr.
Hon. Haywood S. Gilliam, Jr.